

EXHIBIT “A”

United States Bankruptcy Court, Northern District of California

Fill in this information to identify the case (Select only one Debtor per claim form):

- ☐ PG&E Corporation (19-30088)
- ☒ Pacific Gas and Electric Company (19-30089)

Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Unless an exception in the Bar Date Order applies to you, you should not use this form to submit a claim that arises out of or relates to the fires that occurred in Northern California prior to January 29, 2019.

Part 1: Identify the Claim

| | | |
|--|--|--|
| 1. Who is the current creditor? | City and County of San Francisco Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor Various Departments or agencies | |
| 2. Has this claim been acquired from someone else? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____ | |
| 3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) | Where should notices to the creditor be sent? | Where should payments to the creditor be sent? (if different) |
| | Contact phone (415) 981-1400 or (415) 544-3944 Contact email etredinnick@greeneradovsky.com | Contact phone (415) 554-4664 Contact email Suzy.Hong@sfcityatty.org |
| 4. Does this claim amend one already filed? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ | Filed on _____ MM / DD / YYYY |
| 5. Do you know if anyone else has filed a proof of claim for this claim? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____ | |

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ See Attachment. Does this amount include interest or other charges?
☒ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?
Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or creditcard.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? ☒ No
☐ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☐ Other. Describe: _____

Basis for perfection: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____

Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %

☐ Fixed

☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ _____

☐ Up to \$2,850 of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$12,850) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Owen Clements
Owen Clements (Oct 18, 2019)

Email: etredinnick@greeneradovsky.com

Signature

Print the name of the person who is completing and signing this claim:

Name Owen Clements

First name Middle name Last name

Title Deputy City Attorney

Company San Francisco City Attorney's Office

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 1390 Market Street, 7th Floor

Number Street

San Francisco

CA

94102

City

State

ZIP Code

Contact phone (415) 554-3944

Email

owen.clements@sfcityatty.org

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☒ I have supporting documentation.
(attach below)

☐ I do not have supporting documentation.



Attachment

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of January 29, 2019.**
- **Fill in the caption at the top of the form.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **Attach any supporting documents to this form.**
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called “Bankruptcy Rule”) 3001(c) and (d).

- **Do not attach original documents because attachments may be destroyed after scanning.**
- **If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.**
- **A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual’s tax identification number, or financial account number, and only the year of any person’s date of birth.** See Bankruptcy Rule 9037.
- **For a minor child, fill in only the child’s initials and the full name of the child’s parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent’s website at <https://restructuring.primeclerk.com/pgc>.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate. 11 U.S.C. § 503.

Claim: A creditor’s right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor’s name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual’s tax identification number, or a financial account number, only the initials of a minor’s name, and only the year of any person’s date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. § 507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. § 506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of § 1325(a).

Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 “D” Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your claim if you wish to receive a date-stamped copy.

| |
|--|
| Do not file these instructions with your form |
|--|

United States Bankruptcy Court, Northern District of California

Fill in this information to identify the case (Select only one Debtor per claim form):

- ☐ PG&E Corporation (19-30088)
- ☐ Pacific Gas and Electric Company (19-30089)

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Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Unless an exception in the Bar Date Order applies to you, you should not use this form to submit a claim that arises out of or relates to the fires that occurred in Northern California prior to January 29, 2019.

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim) _____

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

☐ No

☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Contact phone _____

Contact phone _____

Contact email _____

Contact email _____

4. Does this claim amend one already filed?

☐ No

☐ Yes. Claim number on court claims registry (if known) _____

Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☐ No

☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$_____. Does this amount include interest or other charges?
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or creditcard.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? ☐ No
☐ Yes. The claim is secured by a lien on property.

Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$_____

Amount of the claim that is secured: \$_____

Amount of the claim that is unsecured: \$_____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$_____

Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☐ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$_____

11. Is this claim subject to a right of setoff? ☐ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☐ Yes. Check one:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$2,850 of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$12,850) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____(mm/dd/yyyy)

Signature

Print the name of the person who is completing and signing this claim:

Name

First name

Middle name

Last name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Number

Street

City

State

ZIP Code

Contact phone

Email

Attachment to Proof of Claim
of
The City and County of San Francisco, a Municipal Corporation
relating to Litigation Claims

The City and County of San Francisco (“CCSF”) submits this Proof of Claim against Pacific Gas & Electric Company (“PG&E”) regarding a number of outstanding litigation claims that were pending at the time of the filing of PG&E’s bankruptcy case.

The claims submitted in this Proof of Claim are identified in more detail on the attached spreadsheet which identifies and details the outstanding claims that CCSF asserts against PG&E. Any relevant documentation for the claims is also attached hereto, except as indicated when documentation is voluminous, in such case the documentation will be provided upon request. The claims set forth in this Proof of Claim on behalf of CCSF includes pending settlement agreements and pending litigation claims which will be described generally below:

PENDING SETTLEMENT AGREEMENTS

CCSF has several claims against PG&E that have been or could be the subject of litigation that have been pending for significant amount of time and which at the time of the filing of PG&E’s bankruptcy case were the subject of settlement negotiations. In several instances, CCSF and PG&E had reached tentative agreements that either had not been fully documented, or had not been approved by the respective governing boards of either CCSF or PG&E. In certain instances, negotiations have continued since filing of the bankruptcy petition, however, it is unlikely that approval of any of these pending settlements would be obtained from either the bankruptcy court or the relevant bodies of CCSF that are required to conclude a settlement, prior to the claims bar date. For this reason, CCSF is filing these claims to preserve its rights against PG&E on the underlying claims going forward.

GENERAL LITIGATION CLAIMS

CCSF also has several pending litigation claims in state and federal courts against PG&E either directly or with respect to counter or cross-claims for personal injuries in which CCSF has been named a defendant. The plaintiffs in some of these actions have received relief from stay to continue these actions against PG&E. CCSF files these claims to preserve its rights going forward. At this point these claims are contingent and unliquidated and it is uncertain at this time if there will be any monetary claim arising from these matters.

CCSF has also initiated a number of actions before the Federal Energy Regulatory Commission (“FERC”) challenging actions regarding the practices of PG&E under its wholesale distribution tariff. CCSF obtained relief from stay to pursue these matters that are currently pending at FERC and the amount of any monetary recovery, if any, is unknown at this time.

RESERVATION OF RIGHTS

CCSF reserves the right to amend or supplement this proof claim from time to time hereafter as it may deem necessary or proper.

This Proof of Claim is not intended to be, and shall not be construed as a consent to the jurisdiction of the bankruptcy court nor a waiver of any right to the determination of any issue or matter by a jury. Further, this proof of claim for monetary damages shall not constitute a waiver of the rights of CCSF for injunctive or other equitable relief available to them against PG&E under applicable law.

| <u>Date of Incident(s)</u> | <u>Short Title</u> | <u>Description of Claim</u> | <u>Amount of Claim</u> |
|----------------------------|----------------------------------|---|--|
| LITIGATION | | | |
| January 2016 | CCSF v. PG&E | CCSF v. PG&E, SF Superior Court No.: CGC-17-561957. Facts: PG&E negligently installed gas pipelines during a 2015 PG&E relocation project along Casitas Avenue in San Francisco that resulted in a landslide, destroying one home and damaging five others. The City paid more than \$9.2 million in claims to homeowners and has or will incur another \$2.6 million in associated costs. The City sued PG&E for negligence, breach of contract and declaratory relief on October 18, 2017. Prior to the filing of the bankruptcy case, and subject to San Francisco Board of Supervisor's approval, the City tentatively agreed to a settlement with PG&E and PG&E agreed to repair its defective utility trench. | Unliquidated, but estimated in excess of \$11,000,000. |
| Various | Cross Bore Agreement | PG&E negligently directionally drilled gas distribution lines throughout San Francisco causing gas lines to penetrate City sewer assets ("crossbores") resulting in an explosion risk and creating a serious public safety issue. PG&E identified more than 150,000 potential crossbore sites. In October 2014, PG&E agreed to inspect all sites by April 14, 2016, and to complete crossbore repairs by October 14, 2017. PG&E is two years late and in breach of that agreement with tens of thousands of sites left to inspect. Although the City and PG&E have a process in place to coordinate inspections, PG&E is not engaging in any meaningful way and does not appear serious about completing this critical safety project. PG&E estimates the cost to complete the crossbore inspections and repairs at \$80 million. | Unliquidated |
| Various | Gas House Cove | At the turn of the century, PG&E operated a coal gasification plant near Fort Mason that polluted San Francisco's East Harbor, where the City operates a marina ("Gas House Cove"). Since the 1990s, the City has been unable to dredge, rendering the marina barely operational. In 2001, the City sued PG&E. In 2004, the court dismissed the action without prejudice to facilitate settlement negotiations. The parties have diligently investigated the pollution cause and explored remediation options. The parties had reached agreement a tentative agreement on a clean-up plan, with both parties estimating that clean up would cost in excess of \$190 million. The tentative agreement was not finalized pre-petition and is subject to approval of both the City and the bankruptcy court. | Unliquidated |
| 7/25/2018 | Fishkin, Janet v. CCSF | Janet Fishkin v. CCSF, SF Superior Court Case No.: 19-574452 Facts: Plaintiff allegedly tripped in the vicinity of a PG&E guy wire near 3255 21st Street in SF and claims injuries to her mouth and wrists. Plaintiff sued on 3/12/19 and named only CCSF. Second CMC set for 10/23/19. No trial date has been set. | Unliquidated alleged > \$25,000 |
| 1/26/2016 | Gelman, Marina & Mikhail v. CCSF | Gelman, Marina & Mikhail v. CCSF, SF Superior Court Case No.: 17-556763 Facts: Plaintiff alleged that she "tripped over a raised PG&E utility cover" at 2032 Union Street. She claims multiple serious personal injuries, including needing wrist surgery. Plaintiff sued both PG&E and CCSF. PG&E filed a notice of bankruptcy stay on 2/4/19. On 9/19, the Gelmans and PG&E stipulated to mediate the matter within 60 days. If mediation is not successful, the parties stipulated to lift the stay by 1/15/20 and try the case around 6/1/2020. | Unliquidated alleged > \$25,000 |
| 8/17/2017 | Williams, Ebony v. CCSF | Williams, Ebony v. CCSF, SF Superior Court Case No.: 18-564671 Facts: Plaintiff allegedly fell on sidewalk near 300 Buchanan Street in SF and claims injuries to her knee and ankle. Plaintiff sued both PG&E and CCSF. PG&E filed a notice of bankruptcy stay on 1/29/19. Jury trial that was set for 11/18/19 vacated due to bankruptcy stay. | Unliquidated alleged > \$25,000 |
| 7/10/2017 | Synergy v. CCSF | Synergy Project Management, Inc., v. CCSF, United States District Court Northern District of California Case No.: 3:17-cv-06763 Facts: Sub-contractor Synergy Project Management, Inc. broke 5 PG&E gas lines while working on the Haight Street Project. While PG&E is not a named party, Synergy alleges that it hit the gas lines because they were not properly placed, mapped, or identified. PG&E is responsible for proper placement, mapping, and identification of its gas lines within San Francisco. | Unliquidated but estimated in excess of \$5,000,000. |

| | | | |
|------------|--|--|--------------|
| 1/28/2019 | CCSF v. PG&E (FERC) | CCSF v. PG&E, Federal Energy Regulatory Commission (FERC) Case No: EL19-38 Facts: CCSF filed a complaint against PG&E challenging interconnection practices of PG&E under wholesale distribution tariff. | Unliquidated |
| 10/17/2014 | CCSF v. PG&E (FERC) | CCSF v. PG&E, Federal Energy Regulatory Commission (FERC) Case No: EL15-3-00 and related consolidated disputes on service regarding the Wholesale Distribution Tariff (FERC Proceeding Nos. ER15-702, ER15-703, ER15-704, ER15-705, ER15-735) Facts: Notice of City and County of San Francisco's 10/7/14 filing of a formal complaint against Pacific Gas and Electric Company, alleging that the Respondent unreasonably denied service to Complainant under its Wholesale Distribution Tariff under EL15-3 | Unliquidated |
| Various | Pacific Gas and Electric Company Quarterly Filings (FERC) | Federal Energy Regulatory Commission (FERC) Case Nos. ER17-910, ER17-1509, ER17-2181 and ER18-1102 Facts: Pending disputes regarding PG&E's quarterly filings | Unliquidated |
| 10/1/2018 | Pacific Gas and Electric Company Transmission Owner Rate Case TO2020 (FERC) | Federal Energy Regulatory Commission (FERC) Case No. ER19-13 Facts: CCSF may be entitled to refunds as a customer in this PG&E rate case | Unliquidated |
| 7/27/2017 | Pacific Gas and Electric Company Transmission Owner Rate Case 2018 (TO2019) (FERC) | Federal Energy Regulatory Commission (FERC) Case No. ER17-2154 Facts: CCSF may be entitled to refunds as a customer in this PG&E rate case | Unliquidated |
| 7/29/2016 | Pacific Gas and Electric Company Transmission Owner Rate Case 2017 (TO2018) (FERC) | Federal Energy Regulatory Commission (FERC) Case No. ER16-2320 Facts: CCSF may be entitled to refunds as a customer in this PG&E rate case | Unliquidated |







Electronic Proof of Claim_\$HU@P27386

Final Audit Report

2019-10-18

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2019-10-18 - 6:31:29 PM GMT
-  Owen Clements (etredinnick@greeneradovsky.com) uploaded the following supporting documents:
 -  Attachment
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